



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

October 29, 2007

Reply To
Attn Of: ETPA-088

Ref: 06-078-AFS

John Newcom, District Ranger
Methow Valley District Ranger
24 West Chewuch Road
Winthrop, WA 98862

Dear Mr. Newcom:

The U.S. Environmental Protection Agency (EPA) has reviewed the final Environmental Impact Statement (FEIS) for the **Tripod Fire Salvage Project** (CEQ No. 20070205) in the Okanogan and Wenatchee National Forests. We are submitting comments in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

The proposed action and preferred alternative is Alternative B. This alternative would salvage harvest dead and fire-injured trees expected to die within one year on 2,748 acres and fell and/or remove danger trees along 47 miles of road. In addition, this alternative would provide for planting of salvage units where natural regeneration would be insufficient to ensure reforestation within 5 years. Approximately 17.9 million board feet would be harvested, three miles of temporary road would be constructed, and a total of 29.4 miles of road would be reopened. No long term-increase in open road density would result from the salvage harvest.

In our comments on the draft EIS in July 2007, EPA raised concerns around the narrowly defined purpose and need for this project, which precludes the consideration of active restoration (such as a reduction of road density in those areas currently exceeding plan standards), and the future fire risk that may be presented by pursuing active planting. We also noted the opportunity presented by this project to help validate and calibrate the Scott Guidelines by monitoring survival of fire-damaged trees across the Tripod burn area. We appreciate the treatment of these questions in the FEIS.

In particular, we appreciate the additional detail provided in the document related to tree planting criteria, and the discussion of the effects of salvage harvest and reforestation activities on fuels and potential reburn hazards (Chapter 3.10). In addition, we appreciate the update on the ongoing efforts across the northwest to validate and calibrate the Scott Guidelines.

Finally, we recognize and appreciate the need to complete this analysis as expediently as possible in order to initiate harvest while dead and dying timber has the highest market value.

However, we continue to encourage the Forest Service to look for opportunities to incorporate watershed restoration activities (such as road closure/culvert removal or resizing) into larger forest management projects such as the Tripod Salvage Project, particularly where these activities are prescribed by the Forest Plan.

Thank you for the opportunity to comment on the EIS. Please feel free to contact Teresa Kubo, at (503) 326-2859 with questions about our comments.

Sincerely,

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Christine B. Reichgott, Manager
NEPA Review Unit